

EXHIBIT C

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DECLARATION OF ERIC W. SWANIS

ERIC W. SWANIS, ESQ.

Nevada Bar No. 06840

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Counsel for Defendants Enterprise Leasing Company-West, LLC

dba Enterprise Rent-A-Car and Enterprise Holdings, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DANIELLE S. BRISSETT, an individual;
ANTHONY HAMMOND JR., an individual;
D.B., a minor by and through his natural mother
and guardian DANIELLE S. BRISSETT; C.E., a
minor by and through her natural mother and
guardian DANIELLE S. BRISSETT; and L.B., a
minor by and through her natural mother and
guardian DANIELLE S. BRISSETT;

Plaintiffs,

v.

ENTERPRISE LEASING COMPANY-WEST,
LLC dba ENTERPRISE RENT-A-CAR, a
foreign limited liability company; ENTERPRISE
HOLDINGS, INC., a foreign corporation;
DOES 1 through 10; ROE CORPORATIONS 13
through 20; and ABC LIMITED LIABILITY
COMPANIES 21 through 30, inclusive,

Defendants.

Case No.

**DECLARATION OF ERIC SWANIS IN
SUPPORT OF NOTICE OF REMOVAL
OF ACTION PURSUANT TO 28 U.S.C.
§§ 1332, 1441, and 1446**

I, ERIC W. SWANIS, hereby declare:

1. I am competent to testify to the matters stated herein based upon personal knowledge.

2. This declaration is made in support of Defendants Enterprise Leasing Company-
West LLC dba Enterprise Rent-A-Car's ("Enterprise West") and Enterprise Holdings, Inc.'s

1 (“Enterprise Holdings” or collectively with Enterprise West, the “Enterprise Defendants”) Notice
 2 of Removal from the Eighth Judicial District Court of Clark County, Nevada, to the United States
 3 District Court for the District of Nevada (the “Notice”).

4 3. I am an attorney licensed to practice law in the State of Nevada and am a shareholder
 5 with the law firm of Greenberg Traurig, LLP (“GT”), counsel for the Enterprise Defendants in the
 6 above-entitled action.

7 4. On June 27, 2024, counsel for Plaintiffs in the above-entitled action served GT on
 8 behalf of the Enterprise Defendants with a four (4) page settlement demand letter (“Demand
 9 Letter”).¹

10 5. In addition to demanding millions of dollars in damages, Plaintiffs’ Demand Letter
 11 specifically outlines why they believe such damages are warranted in this case and given the
 12 damages awards in other cases involving alleged false police reports by car rental companies.
 13 Further, the Demand Letter outlines the specific amount of damages demanded on behalf of each
 14 Plaintiff, separately, and for each, the demands are all far exceed \$75,000 per named Plaintiff in this
 15 case.

16 6. I declare under penalty of perjury under the laws of the State of Nevada and the
 17 United States of America that the above statements are true.

18 Dated this 26th day of July, 2024.

19 /s/ Eric W. Swanis
 20 ERIC W. SWANIS, ESQ.

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 28 ¹ Defendants will present a copy of the Demand Letter to the Court *in camera* or under seal should
 the Court desire to review it.